

EXHIBIT 1-D

5:11-cv-306

**DECLARATION OF KRISTEN E. KNAUF
REGARDING RESPONSE TO
MOTION TO TRANSFER VENUE
D. GEOLFOS' INITIAL RULE 26 DISCLOSURES**

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

WILLIAM C. SPENT, JR. d/b/a §
SPENT SADDLERY & FEEDS, §
§
Plaintiff, §
§
v. § **No. 5:11-CA-306-XR**
§
DAN GEOLFOS §
§
Defendant. §

DEFENDANT DAN GEOLFOS' RULE 26 INITIAL DISCLOSURES

Defendant Dan Geolfos ("Defendant") serves this, its initial disclosures, pursuant to FED. RULE CIV. PROC. 26(a)(1).

(a) Required Disclosures

i. **Individuals likely having discoverable information:** The names, and to the extent known, the address and telephone numbers for each individual likely to have discoverable information relevant to disputed facts alleged in the pleadings, together with an identification of the subjects of the information are as follows:

1. Dan Geolfos
9155 3400 Road
Hotchkiss, CO 81410
(800) 788-4352

Mr. Geolfos is the Defendant in this case and has knowledge of the facts of the case.

2. William C. Spent, Jr.,
c/o Stephen A. Kennedy
Kennedy Clark & Williams, P.C.
1700 Pacific Avenue, Suite 1280
Dallas, TX 75201
3. Adam Silverstein

34830 Powell Mesa Road
Hotchkiss, Colorado.
(970) 872-4414

Ms. Silverstein designed Defendant's web site.

4. David Lane
459 Palmer St.
Delta, CO 81416
970-874-7501

Mr. Lane is an Accountant for Defendant and can testify to financial matters related to Defendant's business.

5. James R. Briscoe
P.O. Box 120
120 East Bridge Street
Hotchkiss, CO 81419
Telephone: (970) 872-3118

Mr. Brisce is an attorney for Defendant and has knowledge regarding attorney's fees.

6. Charles Hanor
Hanor Law Firm
750 Rittiman Road
San Antonio, Texas 78209
(210) 829-2002 Phone
(210) 829-2001 Fax
chanor@hanor.com

Mr. Hanor is an attorney for Defendant and has knowledge regarding attorney's fees.

Discovery in this case is ongoing. As such, there may be other individuals who have information relevant to Defendants' claims. Defendants reserve the right to supplement their response to this request as may become necessary in accordance with any applicable provisions of the Federal Rules of Civil Procedure.

ii. Description by category and location of documents: Pursuant to Federal Rule of Civil Procedure 26(a)(1)(B), which requires that Defendants disclose “a copy of, or a description by category and location of, all documents, data, compilations, and tangible things in the possession, custody, or control” of Defendant.

1. Defendant states it or Plaintiffs have, inter alia, the following categories of documents: invoices and advertisements.
2. Defendant’s documents are located at Defendant’s offices in Colorado.
3. Defendant may also rely on any of the documents produced by Plaintiff and any third party. Defendant may also rely on any documents marked as exhibits in this matter, expert reports, documents cited within expert reports and supporting documentation for each report.
4. Defendant reserves the right to supplement their response to this request as may become necessary in accordance with any applicable provisions of the Federal Rules of Civil Procedure.

iii. Computation of each category of damages:

1. Plaintiff may be requesting attorneys fees. At this stage Defendant is unable to compute attorneys fees.
2. Defendants reserve the right to supplement their response to this request as may become necessary in accordance with any applicable provisions of the Federal Rules of Civil Procedure.

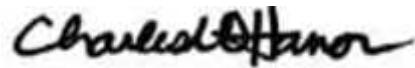
iv. Insurance agreement for liability for any judgment:

1. None.

2. Defendants reserve the right to supplement their response to this request as may become necessary in accordance with any applicable provisions of the Federal Rules of Civil Procedure.

Date: June 16, 2011

Respectfully submitted,



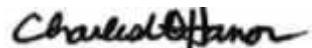
Charles W. Hanor

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750 Rittiman Road
San Antonio, TX 78209
210-829-2002 Direct
210-842-9500 Mobile
210-829-2001 Fax
chanor@hanor.com
Counsel for Defendant
DAN GEOLFOS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record who is deemed to have consented to electronic service via the email address listed below on June 16, 2011:

STEPHEN A. KENNEDY
KENNEDY CLARK & WILLIAMS, PC
Texas State Bar No. 11300425
1700 Pacific Avenue, Suite 1280
Dallas, TX 75201
Direct Line: 214-979-1122
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Charles W. Hanor